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Attorneys for Defendant
 JORDAN MICHAEL MOORE

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND BRANCH

UNITED STATES OF AMERICA,)	No. CR 11-00905 SBA
)	
Plaintiff,)	
)	
v.)	STIPULATION AND [PROPOSED]
)	ORDER TO CONTINUE STATUS
JORDAN MOORE,)	HEARING TO JUNE 11, 2015
)	
Defendant.)	

The above-captioned matter is set for May 29, 2015, before this Court for a status hearing, or in the alternative, change of plea. The parties jointly request that the Court vacate the May 29, 2015, appearance and set this matter for status conference, or change of plea on June 11, 2015, at 9:30 a.m. and that the Court exclude time under the Speedy Trial Act between the date of this stipulation and June 11, 2015. The parties stipulate that the time is excludable from the time limitations of the Speedy Trial Act because the interests of justice are served by granting a continuance pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

The continuance is a joint request by the parties to finalize a plea agreement that will resolve pending robberies that require coordination with and releases from other jurisdictions. Both counsel have

1 been meeting and conferring about a potential resolution, including proceeding on the Hobbs Act
2 conspiracy. This continuance will allow for reasonable time necessary for effective preparation and
3 continuity of counsel, taking into account the complexity of the case and the exercise of due diligence.

4 As such, the parties respectfully request that the time between the date of this stipulation and May
5 11, 2015, be excluded under U.S.C. § 3161(h)(7)(A) and (B)(iv).

6
7 DATED: May 27, 2015

Respectfully submitted,

8 MELINDA HAAG
United States Attorney

9
10 /s/ *Christina McCall*
CHRISTINA McCALL
Assistant United States Attorney

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12 /s/ *Richard Hullinger*
13 RICHARD G. HULLINGER
Attorney for Jordan Moore

~~[PROPOSED]~~ ORDER

Based on the reason provided in the stipulation of the parties above, the Court hereby FINDS that for adequate preparation of the case by all parties, and in the interest of justice, pursuant to 18 U.S.C. sections 3161(h)(7)(A) and (B)(iv), an exclusion of time is warranted under the Speedy Trial Act. Based on these findings, IT IS HEREBY ORDERED THAT the hearing is continued until June 11, 2015, at 9:30 a.m., and time is excluded until June 11, 2015.

IT IS SO ORDERED.

DATED: 5/28/15



The Honorable Kandis A. Westmore
United States Magistrate Judge